



DEPARTMENT OF THE NAVY
COMMANDER NAVY REGION SOUTHWEST
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SAN DIEGO, CA 92132-0058

IN REPLY REFER TO:

January 2008

MEMORANDUM FOR FILE

From: Commander, Navy Region Southwest

Subj: CONTINUING ENVIRONMENTAL REVIEW OF PROPOSED NAVY LODGE
COMPLEX EXPANSION AT NAVAL AIR STATION NORTH ISLAND
(NASNI); EVALUATION OF NEW INFORMATION SINCE ISSUANCE OF
FINDING OF NO SIGNIFICANT IMPACT

Ref: (a) Final Environmental Assessment for the Navy Lodge
Complex Expansion, NASNI, Jan 2006
(b) Finding of No Significant Impact for the Proposed Navy
Lodge Complex Expansion at NASNI signed 31 Jan 2006
(c) United States Department of the Interior Fish
And Wildlife Service Biological Opinion on Phase 1 of
the Navy Lodge Expansion Project, NASNI of 20 July 2005
(d) State of California, California Coastal Commission ND -
93-05 Navy Negative Determination, Expansion of Navy
Lodge Complex, NASNI of 15 Dec 2005

Encl: (1) Department of Navy letter to U.S. Fish and Wildlife
Service regarding Navy Lodge Complex Expansion Project
at NASNI (Ser N4/243) dated 15 Jun 2007
(2) U.S. Department of Interior Fish and Wildlife Service
letter to Naval Base Coronado regarding Amendments to
Navy Lodge Expansion Project, NASNI (FWS-SDG-3908.6)
dated 10 Aug 2007

1. In 2006, the Navy developed reference (a) to take a hard look at the environmental consequences and anticipated from the proposed Navy Lodge complex expansion at NASNI. References (c) and (d) were considered in the development of reference (a) and the eventual signing of reference (b). References (c) and (d) represented the primary environmental concerns of the proposal: endangered species issues, and coastal use issues. Those documents also represented concurrence by the relevant regulatory agency that the project under terms contained in those documents would not "significantly impact the human environment", as that phrase is understood pursuant to the National Environmental Policy Act (NEPA) and related authority.

2. In 2007, after signature of reference (b) the project proponent made the following design changes to the project. Revision from the originally proposed Phase 1 concept, as described in Enclosure 1, includes:

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- o construction of one 4-story Navy Lodge building and 10 duplex cottages, as opposed to three or four 2-story Navy Lodge buildings and 10 duplex cottages. In addition, the proposed cottage area and the new Navy Lodge building locations have been switched, with the cottages to the west of the new Navy Lodge building.
- o Revised proposal results in 360 rooms total [100 existing Navy Lodge rooms remain, 90 existing rooms will be demolished, and 220 new Navy Lodge rooms and 10 two bedroom cottage duplexes (40 rooms total) will be constructed]. Previous Phase 1 resulted in 400 rooms total [100 existing Navy Lodge rooms remain, 90 existing rooms were to be demolished, and 260 new Navy Lodge rooms and 10 two bedroom cottage duplexes (40 rooms total) were to be constructed],
- o Revised proposal includes a swimming pool as an amenity which will divert some visitors away from beach usage,
- o The revised proposal shifts the majority of rooms east, further from the protected plover habitat area south of Building 710,
- o Demolition of Building 710, also known as the old Chief's Club or Band Building, (13,691 SF) will convert footprint to beach,
- o Some areas north of cottages will now remain undeveloped with the revised proposal, reducing potential impact to burrowing owls.
- o Revised proposed Navy Lodge is 4 stories instead of the originally proposed 2 stories, but has less horizontal density, thereby reducing overall potential walling-off effects.
- o In addition, the new proposal is a final build out project and does not include future phases, eliminating future requests to increase beach usage. Previous avoidance and minimization measures agreed to with U.S. F&W and CCC, as documented in BO FWS-SDG-3908.5 and the December 15, 2005 Negative Declaration on Phase 1 of the Navy Lodge Expansion Project, will be followed with the revised proposal. For example, buildings will incorporate BASH and/or anti-perch reduction devices, the Navy will clearly mark construction areas with flagging to minimize vehicle driving on the beach during construction, and construction vehicles and equipment will be staged as far from the beach sand as possible.

3. The changes to the project required an additional "hard look" pursuant to NEPA. During the NEPA re-evaluation process, the Navy engaged in an active dialogue with U.S. F&W and CCC, the two agencies with legal jurisdiction over the impacts with potential significance. During an April 19, 2007 meeting with U.S. F&W, U.S. F&W expressed concern over unquantifiable potential impact to the federally threatened western snowy plover due to the

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increase from two to four stories of the Navy Lodge expansion. To address U.S. F&W's concerns, the Navy revised the conceptual site plan for the Navy Lodge Complex Expansion Project by shifting the 4-story building to the north of the originally planned Phase 1 Physically Effected Area, which limits the new beach footprint requirement for the building. The U.S. F&W responded with Enclosure (2), which confirms that no new Terms and Conditions of Biological Opinion FWS-SDG-3908.5 were added as a result of the design change. No additional "take" of listed species is anticipated, and there is no change to the "no jeopardy" conclusion. The CCC stated that they concurred with U.S. F&W. The Navy will continue to work with U.S. F&W to address concerns throughout project design and implementation.

4. I have carefully considered the environmental implications of the changed design, and the input of the primary agencies with expertise in the impact areas of potential concern. I have determined consistent with 40 C.F.R. part 1502.9(c) (applicable to Environmental Impact Statements) that design changes made to the Navy Lodge expansion project as discussed in enclosure (1) do not disturb the conclusion in reference (b). As such, they are not substantial such that a supplement to reference (a) or (b) is necessary. I have made this determination based on the Navy's detailed consideration of all the new information that has become available since the issuance of reference (b), including the references and enclosures to this memorandum. This detailed consideration has drawn on the expertise within Southwest Division, Naval Facilities Engineering Command, Navy Region Southwest, Navy Exchange Command, and Morale, Welfare and Recreation Command, as well as the expertise of outside agencies. Any changed circumstance or new information does not present a significantly different picture of the likely consequences of the actions than were evaluated by reference (a). Accordingly, no further NEPA documentation to supplement the action identified in reference (a) is necessary.



L. R. HERING